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Proposed Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

Gawker Media LLC, et al., 1 : Case No. 16-11700 (SMB)

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Debtors. : (Joint Administration Requested)

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NOTICE OF COMMENCEMENT OF CHAPTER 11 CASES AND HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on June 10, 2016 (the "Petition Date"), Gawker Media LLC ("Gawker Media"), as a debtor and debtor in possession, filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court"). Gawker Media's affiliates, Gawker Media Group, Inc. ("GMGI"), and Kinja Kft. ("Kinja"), as debtors

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.'s offices are located at Andrassy ut 66. 1062 Budapest, Hungary.

and debtors in possession (together with Gawker Media, the "<u>Debtors</u>") each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court on June 12, 2016.

PLEASE TAKE FURTHER NOTICE that on June 12 and June 13, 2016, in addition to their chapter 11 petitions, the Debtors filed the following first day motions and related pleadings (collectively, the "<u>First Day Pleadings</u>"):

- 1. First Day Declaration. Declaration of William D. Holden in Support of First Day Motions. [Docket No. 7]
- 2. 1007 Waiver Motion. Debtor's Motion for an Order (I) Granting a Waiver of the Requirements of Local Rule 1007-2(a), (b), and (c), and (II) Granting an Extension of Time to File Lists Required by Bankruptcy Rule 1007 [Docket No. 2].
- 3. Joint Administration Motion. Debtors' Motion for Joint Administration. [Docket No. 8]
- 4. Consolidated Creditors List Motion. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Prepare a list of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (B) File a Consolidated List of the Debtors' 50 Largest Unsecured Creditors and (II) Approving the Form and Manner of Notifying Creditors of Commencement of These Chapter 11 Cases. [Docket No. 9]
- 5. Schedules Extension Motion. Debtors' Motion for Entry of an Order Extending Deadline for Debtors to File Their Schedules of Assets and Liabilities and Statements of Financial Affairs. [Docket No. 10]
- 6. Case Management Motion. Debtors' Motion for Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures and Omnibus Hearing Dates. [Docket No. 11]
- 7. Cash Management Motion. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Continue Using the Debtors' Bank Accounts, Business Forms, and Cash Management System and Granting Related Relief. [Docket No. 12].
- 8. Wages Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, but Not Directing, Payment of Prepetition Wages, Salaries, Business Expenses, Employee Benefits and Related Items, and (II) Directing All Financial Institutions to Honor Checks for Payment of Such Obligations. [Docket No. 13].
- 9. *Taxes Motion*. Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Income Taxes, Property Taxes, Sales and Use Taxes and Hungarian Taxes. [Docket No. 14].
- 10. Critical Vendors Motion. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors and Foreign

- Vendors and to Continue Paying the Critical Vendors and Foreign Vendors in the Ordinary Course of Business. [Docket No. 15].
- 11. *Insurance Motion*. Debtors' Motion for Entry of Interim and Final Orders Authorizing, but Not Directing, the Debtors to (A) Continue Insurance Coverage Entered into Prepetition, (B) Renew or Purchase New Insurance Policies in the Ordinary Course of Business, and (C) Pay All Prepetition Obligations Relating Thereto. [Docket No. 16].
- 12. *Utilities Motion*. Debtors' Motion for Entry of an Order (A) Prohibiting Utility Companies from Discontinuing, Altering, or Refusing Service, (B) Deeming Utility Companies to Have Adequate Assurance of Payment, and (C) Establishing Procedures for Resolving Requests for Additional Assurance. [Docket No. 17].
- 13. *DIP Motion*. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, and 364 and Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing Incurrence by the Debtors of Postpetition Secured Indebtedness, (II) Granting Liens, (III) Authorizing Use of Cash Collateral by the Debtors and Providing for Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing. [Docket No. 19]
- 14. *Holden Declaration*. Declaration of William D. Holden in Support of DIP Financing Motion. [Docket No. 20].

PLEASE TAKE FURTHER NOTICE that a hearing to consider these motions (the "First Day Hearing") has been scheduled by the Court for June 15, 2016, at 11:00 a.m. (prevailing Eastern Time), with such hearing to be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, in Courtroom No. 723 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 in accordance with the Court's schedule. The Debtors have requested that the Court consider the relief requested in the First Day Pleadings on a final basis, in certain cases, or on an interim basis pending a final hearing to be scheduled at a later date. The Debtors will file an agenda in advance of the First Day Hearing once all of the First Day Pleadings have been filed.

PLEASE TAKE FURTHER NOTICE that the Debtors also have filed certain motions and applications as to which relief will be requested at a later hearing or hearings, the date and time for which will be scheduled by the Court during the First Day Hearing (collectively, the "Later Hearing Pleadings"), including but not limited to the following:

- 1. *Noticing Agent Application*. Debtors' Application Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 503(b)(1)(A), and Local Rule 5075-1 For Entry of an Order Appointing Prime Clerk LLC as Claims and Noticing Agent *Nunc Pro Tunc* To The Petition Date. [Docket No. 25]
- 2. *Prime Clerk Retention Application*. Debtors' Application Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014(a) and Local Rules 2014-1 and 2016-1 for Entry of an order Appointing Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* To the Petition Date. [Docket No. 26].

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings may be obtained free of charge by visiting the website of Prime Clerk LLC at http://cases.primeclerk.com/gawker. You may also obtain copies of any pleadings by visiting the Court's website at http://www.nysb.uscourts.gov in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that <u>your rights may be affected</u>. You should read the First Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to consult with one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

Dated: June 14, 2016

New York, New York

/s/ Gregg M. Galardi_

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